

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT CLEVELAND**

**PATRICIA BANUS**

**CASE NO: 1:17-CV-02132**

Plaintiff,  
v.

**JUDGE JAMES S. GWIN**

**WHOLE FOODS MARKET GROUP,  
INC.**

**PLAINTIFF PATRICIA BANUS'S  
PRELIMINARY BUDGET OF ATTORNEY'S  
FEES AND EXPENSES**

Defendant.

Plaintiff's counsel's preliminary budget of Attorney's fees and costs for this matter pursuant to the Case Management Order.

Attorney's Fees

Preliminary Investigation & Filing the Complaint	\$5,500
Procedural Motion Practice	\$55,000
Discovery	\$100,000
Dispositive Motions Practice	\$75,000
Settlement Negotiations	\$45,000
Trial (including preparation)	<u>\$125,000</u>
<b>TOTAL</b>	<b>\$405,500</b>

\*These fees are for estimate purposes only and do not include the fees related to any Motions for Preliminary or Final Approval of any Class Settlement. Procedural Motion Practice fee includes Motion for Class Certification briefing.

Costs

Depositions	\$40,000
Witness Fees (including expert witnesses)	\$85,000
Other, i.e., copies, postage, overnight, exhibits	<u>\$5,000</u>
<b>TOTAL</b>	<b>\$130,000</b>

\*Deposition costs assume depositions of Defendant's Corporate Representatives may require multiple days or multiple depositions.

Respectfully submitted,

/s/ Brian D. Flick

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*Pro Hac Vice Application to Be Submitted*

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2017, a copy of the foregoing was served in accordance with Local Rules upon the following:

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